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Attorney for Defendant  
ARNES KRAJINIC

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,  
v.

ARNES KRAJINIC,

Defendant.

Case No.: 2:23-CR-00074-DJC

STIPULATION REGARDING  
EXCLUDABLE TIME PERIODS  
UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

DATE: June 13, 2024

TIME: 9:00 a.m.

COURT: Hon. Daniel J. Calabretta

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and  
defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status conference on May 16, 2024.
2. By this stipulation, the parties move to continue the status conference until June 13, 2024, at 9:00 a.m., and to exclude time through June 13, 2024, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes search warrants, photographs, audio recordings, and video recordings. This discovery has been either produced directly to counsel and/or made available for inspection and copying.

STIPULATION REGARDING EXCLUDABLE TIME  
PERIODS UNDER SPEEDY TRIAL ACT

1 b) Counsel for defendant desires additional time to consult with his client  
2 regarding discovery and otherwise prepare for trial. Counsel for defendant has been  
3 delayed in consulting with his client due to recently having to have surgery on April 21,  
4 2024.

5 c) Counsel for defendant believes that failure to grant the above-requested  
6 continuance would deny him the reasonable time necessary for effective preparation,  
7 taking into account the exercise of due diligence.

8 d) The government does not object to the continuance.

9 e) Based on the above-stated findings, the ends of justice served by continuing the  
10 case as requested outweigh the interest of the public and the defendant in a trial within  
11 the original date prescribed by the Speedy Trial Act.

12 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. §  
13 3161, et seq., within which trial must commence, the time period of May 16, 2024, to  
14 June 13, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A),  
15 B(iv) [Local Code T4] because it results from a continuance granted by the Court at  
16 defendant's request on the basis of the Court's finding that the ends of justice served by  
17 taking such action outweigh the best interest of the public and the defendant in a speedy  
18 trial.

19 4. Nothing in this stipulation and order shall preclude a finding that other  
20 provisions of the Speedy Trial Act dictate that additional time periods are excludable  
21 from the period within which a trial must commence.

22 **IT IS SO STIPULATED.**

23 Dated: May 9, 2024

/s/ David D. Fischer

DAVID D. FISCHER

Attorney for Defendant

ARNES KRAJINIC

PHILLIP A. TALBERT  
US ATTORNEY

Dated: May 9, 2024

/s/ Emily Sauvageau  
EMILY SAUVAGEAU  
Assistant United States Attorney

**ORDER**

IT IS SO FOUND AND ORDERED this 10<sup>th</sup> day of May, 2024.

Dated: May 10, 2024

/s/ Daniel J. Calabretta

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THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE